

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI TO  
AMERICAN POSTAL WORKERS UNION INTERROGATORY REDIRECTED FROM  
WITNESS BRATTA TO WITNESS NERI (APWU/USPS-T5-6(a), (c), & (d))  
(March 6, 2012)**

The United States Postal Service provides the response of witness Neri (USPS-T-4) to the above-listed question from the American Postal Workers Union, redirected from witness Bratta (USPS-T-5) and dated January 27, 2012. The question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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March 6, 2012

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REDIRECTED FROM WITNESS BRATTA

**APWU/USPS-T5-6** Please see your response to APWU/USPS-T4-9, redirected to you from USPS Witness Neri.

a) Please list each PD&C that has closed since 2008.

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c) Where in the AMP analysis or PIRs does it show what will happen (or what has happened) to the excess equipment?

d) How is the lost value of excess equipment that is stored, disposed of, or sold for less than its value accounted for in the AMP study or PIR?

**RESPONSE:**

a) As reflected below, 17 P&DC/P&DF closures have occurred between FY 2008 and FY 2011.

Daytona Beach, Florida  
Huntington, West Virginia  
Oxnard, California  
Portsmouth, New Hampshire  
Salinas, California  
Sioux City, Iowa  
Lima, Ohio  
Waterbury, Connecticut  
West Jersey, New Jersey  
Charlottesville, Virginia  
Elmira, New York  
Jamestown, New York  
Wilkes-Barre, Pennsylvania  
Royal Oak, Michigan  
Binghamton, New York  
Marysville, California  
Kansas City, Kansas

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c) The AMP workbooks show the movement of equipment if the equipment is moving to a site included in the AMP analysis. Excess equipment or equipment deployed to other facilities is individually justified outside of the AMP analysis.

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d) This information is not reflected in the AMP process. The accounting of these costs is made in accordance with standard accounting principles.